

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JENNIFER LEVINE,

Plaintiff,

-against-

JOHNSON & JOHNSON,

Defendant.
-----X

PROPOSED DISCOVERY
PLAN

CV 10-03135

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the parties propose the following discovery plan for the above referenced matter:

Initial Disclosures served: December 3, 2010

Date for service of initial document production demands and
interrogatory requests with responses served within thirty (30) days: January 10, 2011

Deadline for motions to amend pleadings including joinder of additional
parties: March 1, 2011

Depositions of fact witnesses: May 16, 2011

Factual discovery complete: June 3, 2011

Plaintiff's expert report exchanged: June 3, 2011

Defendant's expert report exchanged: July 5, 2011

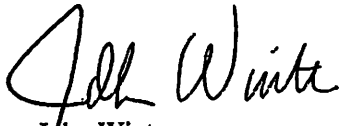
Expert discovery complete: August 8, 2011

Deadline for seeking approval to file any motion for summary
judgment: September 1, 2011

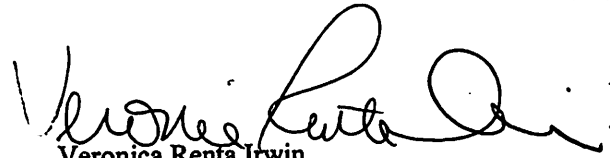
Date for submission of pre-trial order: November 1, 2011

Electronically stored information ("ESI") shall be produced on compact disc or in hard paper
copy when specifically requested or referenced in a demand.

Dated: November 4, 2010



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